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MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
THOMAS A. MCKAY  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494  
[www.maglaw.com](http://www.maglaw.com)

WRITER'S CONTACT INFORMATION

[ranello@maglaw.com](mailto:ranello@maglaw.com)  
212-880-9520

SENIOR COUNSEL  
PAUL R. GRAND  
COUNSEL  
JASMINE JUTEAU  
ROBERT G. MORVILLO  
1938-2011  
MICHAEL C. SILBERBERG  
1940-2002  
JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*ALSO ADMITTED IN CONNECTICUT

November 15, 2023

**VIA ECF**

Hon. P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 11D  
New York, New York 10007

Re: United States of America v. Oleg Vladimirovich Deripaska, et al., 22-CR-00518  
(PKC)

Dear Judge Castel:

I represent defendant Natalia Bardakova in the above-referenced matter. On November 3, 2023, on behalf of Ms. Bardakova, I filed a motion to dismiss the indictment. See Dkt. No. 34. Since then, I have conferred with AUSA Vladislav Vainberg regarding a briefing schedule. On behalf of both parties, I respectfully request that the Court permit the government to file its brief in opposition to the motion to dismiss on December 21, 2023, and Ms. Bardakova to file her reply brief on January 18, 2024. If this schedule is acceptable to the Court, the parties respectfully request that the Court "so order" this letter. Because Ms. Bardakova is not in the United States, the Speedy Trial clock has not yet begun to run. See 18 U.S.C. § 3161(c)(1). I thank the Court for its attention to this matter.

Respectfully submitted,

MORVILLO ABRAMOWITZ  
GRAND IASON & ANELLO P.C.

By: /s/ Robert J. Anello  
Robert J. Anello

*Counsel to Defendant Natalia Bardakova*

cc: AUSA Vladislav Vainberg (by email)

*Application GRANTED  
SO ORDERED  
J. J. Anello  
USA  
11/15/23*